

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Jenkins & Clayman Stephanie F. Ritigstein 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtor	
In Re:	
Anthony Martinez	
debtor	

Case No.: 19-22978

Judge: Michael B. Kaplan

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by WRI Property Management, creditor.

A hearing has been scheduled for January 14, 2020, at 9:00 a.m..

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support of attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

On November 15, 2019, I had my attorneys file a Motion to Reinstate the Stay as to this Creditor, my landlord. We needed to file the Motion so that the Trustee could make disbursements on the arrears owed. At the State Court hearing on September 12, 2019, I brought my post-petition account current. The Motion to Reinstate the Stay was unopposed and an Order was entered December 4, 2019 Reimposing the Automatic Stay. I paid my November 2019 rent payment, which landlord acknowledges, and I will pay my December 2019 and January 2020 payments on January 8, 2020. Therefore, landlord's Motion should be denied.

3. I certify under penalty of perjury that the above is true.

Date: January 7, 2020

/s/ Anthony Martinez
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.